

### **Remarks**

Reconsideration of the application in view of the above amendments and the following remarks is requested.

Amendments are provided to clarify subject matter presently defined by the claims. No new matter has been added as a result of the amendments submitted herewith. In brief, support for the amendments may be found in a variety of places in the specification as originally filed including at page 8 lines 31 to page 9 line 11 ("The terminal runtime environment of the devices 100 preferably supports the following basic functions ... provide data storage service to maintain local client data in the memory module 210 ... of the device 100"), figure 2, and page 11 lines 17-20 ("it is recognized that the device infrastructure 204 can include a computer readable storage medium 212 coupled to the processor 208 for providing instructions to the processor and/or to load/update client application programs 302 in the memory module 210").

### **I. Claim Rejections – 35 U.S.C. § 101**

The Examiner rejected claims 18-34 as being directed to non-statutory subject matter.

Applicant has amended claim 18 so that it now positively defines the structural and functional interrelationships between the computer program and other claims elements of the computer which permit the computer program's functionality to be realized. In particular, the system claimed in claim 18 has been clarified to include memory for storing instructions and a processor for executing the instructions. Support for the amendments to claim 18 can be found, for example, at page 8 lines 31 to page 9 line 11, page 11 lines 17-20 and figure 2.

Claims 19-34 depend on claim 18 and as a result the above amendments and remarks apply equally to claims 19-34.

Applicant therefore submits that claims 18-34 as presently amended do comprise statutory and patentable subject matter.

## **I. Claim Rejections – 35 U.S.C. § 103(a)**

### **Claim 1**

The Examiner rejected claims 1-12, 14, 19-29, 31, 35-36 and 38 as being unpatentable over Hulai in view of newly cited Carroll Jr.

The Examiner writes that Hulai discloses all elements of claim 1 with the exception of identifying at least one mapping present in the screen component, the mapping for specifying a relationship between the screen component and the data component as defined by an identifier representing the mapping. Applicant respectfully traverses the rejection.

The Examiner argues that Carroll Jr. does disclose identifying at least one mapping present in the screen component, the mapping for specifying a relationship between the screen component and the data component as defined by an identifier representing the mapping.

In particular the Examiner cites the following figures and passages from Carroll Jr.:

- Fig. 24, elements 102, 104, 110, 112 and 114;
- Paragraph [0188]: During the application compilation process, the parser 112 uses information both in the application source code 102 and the user interface definition file (the data components) to create the applications' graphical user interface 114 (the screen components);
- Paragraph [0017]: to segregate the various application or software logic, and interface design aspect, of the application development process;
- Figure 22;

- Paragraph [0270]: to easily manipulate and specify, through a series of hierarchical properties and input fields (the data component), a particular graphical user interface definition. The data entered through this graphical-based tool can then be used to define or generate the source interface XML file, and hence the interface itself ... A property file 110 can be used to map to a subset of graphical elements in the interface class library;
- Paragraphs [0215] – [0218];
- Paragraph [300]; and,
- Page 89, Left-Col., Lines 39-42: said application interface file is an extended markup language file which maps application screen component function calls to Java screen component classes.

The Applicant respectfully disagrees with the Examiner's rejection with respect to Carroll Jr. and with the Examiner's characterization of Carroll Jr.

Specifically, Carroll Jr. teaches creating user interfaces for software applications using an interface library while segregating the various application or software logic and interface design aspects of the application development process.

However, nowhere in Carroll Jr. is there a suggestion of at least one mapping present in the screen component as required by the applicant's invention. To this end, the Applicant points out that the property in Carroll Jr. is not "present in the screen component" as claimed. Rather, the property file (which "can be used to map to a subset of graphical elements within the user interface definition file") is, for example, "loaded into the Java runtime environment ...", which is distinctly different than being present "in the screen component." No other element of Carroll Jr. refers to mapping.

Further, Applicant submits that the system as described in Carroll Jr. creates a graphical user interface out of data without providing for synchronization and that

the mapping in Carroll Jr. (e.g. from paragraph [300]) is not interactive and it is therefore different than the mapping in the application as claimed.

As mentioned in the previous response (dated April 25, 2008), changes to the application domain data are automatically synchronized with the user interface, and user-entered data is automatically reflected in the application domain data. The primary mechanism behind this synchronization is the mapping of screens and data. This mechanism enables creation of dynamic and interactive screens. All changes to the data components can be immediately reflected on the screens and vice versa.

Again, there is no such synchronization in Carroll Jr. Rather, the graphical user interface as suggested in Carroll Jr. is created, defined or generated, from the data or source code.

For example, at paragraph [0270] (as cited by the Examiner) Carroll Jr. writes: "The data entered through this graphical-based tool can then be used to define or generate the source interface XML file, and hence the interface itself."

Similarly, at paragraph [0188] Carroll Jr. writes: "A system such as shown could be incorporated into a software application development system for the development of a graphically rich application. ... During the application compilation process, the parser 112 uses information both in the application source code 102 and the user interface definition file 104 to create the applications' graphical user interface 114."

Beyond these two passages there is no reference to synchronization of data in Carroll Jr. There is therefore no interactive synchronization as there is in the mapping as claimed in claim 1.

For the above reasons, the Applicant submits that claim 1 is patentable over the art cited by the Examiner.

The Examiner further rejected claims 18, 35, 36 and 38 as being unpatentable over Hulai in view of Carroll Jr.

The Applicant respectfully submits that the Examiner's rejection of claims 35, 36 and 38 is substantively similar to that of claim 1 and therefore the Applicant relies on the arguments submitted above in relation to claim 1.

Applicant submits that for the above reasons claims 35, 36 and 38 are patentable over the cited art.

The remaining dependent claims are dependant on one of the dependent claims. Accordingly, the dependent claims are patentable for at least the same reasons as discussed above.

For all of the reasons set out above, Applicant respectfully submits that the application in its presently amended form is in condition for allowance and action toward that goal is respectfully requested.

Respectfully submitted,

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